

HOLLAND & KNIGHT LLP
Kristina S. Azlin (CA SBN 235238)
kristina.azlin@hklaw.com
Andrew M. Cummings (CA SBN 305081)
andrew.cummings@hklaw.com
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Telephone: 213.896.2400
Facsimile: 213.896.2450

Attorneys for Plaintiff Bank of America, N.A.

FRIEDMAN & SPRINGWATER LLP
RUTH STONER MUZZIN (CA SBN 276394)
Email: rmuzzin@friedmanspring.com
CATHERINE M. ROE (CA SBN 331565)
Email: croe@friedmanspring.com
350 Sansome Street, Suite 800
San Francisco, CA 94104
Telephone Number: (415) 834-3800
Facsimile Number: (415) 834-1044

Attorneys for Defendant
GOLDEN STATE FARM CREDIT, FLCA

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

BANK OF AMERICA, N.A., a national
banking association,

Plaintiff,

v.

CAPITAL MED FARMS, LLC, et al.,

Defendants.

Case No. 2:24-cv-02309-DJC-CKD

**STIPULATION OF PLAINTIFF AND
DEFENDANT GOLDEN STATE FARM
CREDIT, FLCA TO EXTEND
DEADLINE TO ANSWER;
ORDER**

STIPULATION

Plaintiff Bank of America, N.A. (“BOA”) and Defendant Golden State Farm Credit,
FLCA (“GSFC”) by and through their undersigned attorneys, hereby stipulate as set forth
below:

RECITALS

WHEREAS, on or about August 23, 2024, BOA filed its initial Complaint in this
action;

1 WHEREAS, on September 27, 2024, BOA filed its First Amended Complaint
2 (“**FAC**”) (Dkt. 10);

3 WHEREAS, the current deadline for GSFC to answer or otherwise respond to the
4 FAC is December 2, 2024;

5 WHEREAS, the Rule 12(b) motion of Defendant TSB AG, Inc. to dismiss the FAC
6 (“**TSB’s Motion**”) is currently set for hearing on March 20, 2025;

7 WHEREAS, a majority of the other defendants’ deadlines to respond to the FAC have
8 not yet passed and no scheduling conference has been set;

9 WHEREAS, no previous request to continue the response deadline for GSFC has
10 been sought or granted;

11 WHEREAS, GSFC does not intend to file a motion under Rule 12(b);

12 NOW THEREFORE, BOA and GSFC, by and through their respective counsel,
13 hereby stipulate that GSFC’s answer to the FAC shall be due on or before the date that is
14 fourteen (14) calendar days after the Court enters its order resolving TSB’s Motion.

15 Dated: November 27, 2024

HOLLAND & KNIGHT LLP

16 By: /s/ Kristina S. Azlin
17 Kristina S. Azlin
18 Attorneys for Plaintiff
BANK OF AMERICA, N.A.

19 Dated: November 27, 2024

FRIEDMAN & SPRINGWATER LLP

20 By: /s/ Ruth Stoner Muzzin (as authorized on
21 11/27/2024)
22 Ruth Stoner Muzzin
23 Attorneys for Defendant
GOLDEN STATE FARM CREDIT, FLCA

24 **IT IS SO ORDERED**

25 Dated: November 27, 2024

26 By: /s/ Daniel J. Calabretta
27 THE HONORABLE DANIEL J. CALABRETTA
28 UNITED STATES DISTRICT JUDGE